

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA
v.
HECTOR DELGADO-ESCAMILLA (1)

Case No. 5:24-CR-00005-XR

**DEFENDANT'S UNOPPOSED MOTION TO CONTINUE SCHEDULING ORDER
DEADLINES**

**TO THE HONORABLE XAVIER RODRIGUEZ, UNITED STATES DISTRICT JUDGE
FOR THE WESTERN DISTRICT OF TEXAS, SAN ANTONIO DIVISION:**

Defendant, Hector Delgado-Escamilla, respectfully submits this motion to continue the scheduling order deadlines for sixty (60) days. In support, and for good cause, Mr. Delgado-Escamilla shows the following:

I.

Mr. Delgado-Escamilla is currently scheduled for a Plea Agreement deadline of Friday, February 9th, 2024, and a Docket Call or Re-Arraignment and Plea scheduled for Thursday, February 22nd, 2024. Undersigned counsel was recently retained to represent Mr. Delgado-Escamilla and needs additional time to adequately investigate the Government's claims against Mr. Delgado-Escamilla.

In addition, undersigned counsel has not had an opportunity to confer with the Government regarding a potential resolution in this case as undersigned counsel

has not received the discovery, which will assist in negotiating an agreement between the parties and adequately preparing a defense. The Government does not oppose this request to continue the scheduling order deadlines. As such, undersigned counsel respectfully requests an additional sixty (60) to adequately prepare and confer with the Government.

II.

Accordingly, Mr. Delgado-Escamilla respectfully prays that the Court grant this motion to continue the current scheduling order deadlines for a period of sixty (60) days.

Respectfully submitted.

GOLDSTEIN & ORR

By: /s/ Kaylie M. Morgan
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Attorneys for Defendant,
HECTOR DELGADO-ESCAMILLA

CERTIFICATE OF SERVICE

I, Kaylie M. Morgan, hereby certify that on the 18th day of January, 2024, a copy of the foregoing was transmitted to the Assistant United States Attorney, Sade Bogart, via the CM/ECF filing system.

By: /s/ *Kaylie M. Morgan*
Kaylie M. Morgan